

EXHIBIT I

Querns, Ann E.

From: Scott, Syreeta - OIG [REDACTED]
Sent: Friday, January 17, 2020 3:21 PM
To: Querns, Ann E.
Subject: RE: USA v. Nikparvar-Fard - Patient Files

You're welcome! There are about 34 boxes.

From: Querns, Ann E. <AQuerns@blankrome.com>
Sent: Friday, January 17, 2020 3:17 PM
To: Scott, Syreeta - OIG <scott.syreeta@oig.dol.gov>
Subject: RE: USA v. Nikparvar-Fard - Patient Files

Thanks so much! Any chance you could give me an estimate of the number of boxes involved, so I can plan accordingly?

Ann E. Querns | BLANKROME
One Logan Square | 130 North 18th Street | Philadelphia, PA 19103
O: 215.569.5674 | F: 215.832.5674 | aquerns@blankrome.com

From: Scott, Syreeta - OIG [REDACTED]
Sent: Friday, January 17, 2020 3:00 PM
To: Querns, Ann E. <AQuerns@blankrome.com>
Subject: RE: USA v. Nikparvar-Fard - Patient Files

Hi Ann,

The files are currently at the DEA Office at 6th and Market. The files can be reviewed and or copied/scanned there. Please make sure to bring a scanner. Please provide me with three potential dates and times that you would like to review the files. I'll schedule a conference room. My number is [REDACTED] if you have any additional questions. Have a nice weekend!

Thank You
Syreeta

From: Querns, Ann E. <AQuerns@blankrome.com>
Sent: Friday, January 17, 2020 1:25 PM
To: Scott, Syreeta - OIG [REDACTED]
Subject: USA v. Nikparvar-Fard - Patient Files

Hi Syretta,

When I spoke with Jason last week, he indicated that I should follow-up directly with you about reviewing/reproducing the patient files we requested. Let me know if it is easier to speak about the issue. At this stage, we are most interested in obtaining some type of reproduction by copying or scanning. What is the easiest way to do that that fits within the DEA guidelines. Please let me know.

Have a great weekend!

Best,
Ann

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From: Bologna, Jason (USAPAE) <Jason.Bologna@usdoj.gov>
Sent: Monday, January 6, 2020 4:42 PM
To: Querns, Ann E. <AQuerns@blankrome.com>
Cc: Frank Desimone <fdesimone2003@yahoo.com>; Poluka, Joseph G. <POLUKA@BlankRome.com>
Subject: Re: USA v. Nikparvar-Fard - Discovery

Ann,

Happy New Year to you, too. Have been out of office since 12/31, am returning tomorrow. I know Syreeta has worked on these issues, and I will speak to her and get back to you on Tuesday or Wednesday.

Sincerely,
Jason

Sent from my iPhone

On Jan 6, 2020, at 2:06 PM, Querns, Ann E. <AQuerns@blankrome.com> wrote:

Hi Jason,

Happy New Year! I wanted to follow-up on those couple of outstanding discovery requests. Please let me know the status when you are able.

Many thanks!
Ann

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From: Bologna, Jason (USAPAE) <Jason.Bologna@usdoj.gov>
Sent: Tuesday, December 10, 2019 4:26 PM
To: Querns, Ann E. <AQuerns@blankrome.com>
Cc: Frank Desimone <fdesimone2003@yahoo.com>; Poluka, Joseph G. <POLUKA@BlankRome.com>
Subject: RE: USA v. Nikparvar-Fard - Discovery

Ann,

Hope you had a nice Thanksgiving as well. My case agent (Syreeta) is away for a few weeks, but I am trying to address the issues you raised below. Are you free to speak on Thursday for a status of where things stand?

Thanks,
Jason

From: Querns, Ann E. <AQuerns@blankrome.com>
Sent: Friday, December 06, 2019 4:57 PM
To: Bologna, Jason (USAPAE) <JBologna@usa.doj.gov>
Cc: Frank Desimone <fdesimone2003@yahoo.com>; Poluka, Joseph G. <POLUKA@BlankRome.com>
Subject: USA v. Nikparvar-Fard - Discovery

Hi Jason,

I hope you had a nice Thanksgiving! I wanted to touch based on some discovery issues. We want to confirm that we have all information related to confidential informants. For the below interactions, we think we are missing information based on what has been provided. For instance, we have documents related to these interactions but no video or visa versa.

- Substantive audio or video for [REDACTED] November 17, 2014 visit.
- Substantive audio or video for [REDACTED] July 18, 2013 visit
- Substantive audio or video for [REDACTED] October 9, 2013 visit
- The date for the visit in Exhibit N3

Also, while our motion requesting all the patient charts is pending, we would like to specifically request access to certain patient records. For each patient, we note the box in which the records should be found, which correlates to the Excel Spreadsheet provided by you, which is attached to this email:

- All patients in Box Number "HC"
- All patients in Box Number "992"

Name	DOB	Box Number
[REDACTED]	10/20/1963	499
[REDACTED]	12/31/1966	313
[REDACTED]	12/31/1966	431
[REDACTED]	6/22/1972	463
[REDACTED]	9/18/1988	499
[REDACTED]	4/15/1983	313
[REDACTED]	11/1/1959	435
[REDACTED]	4/28/1990	921
[REDACTED]	7/4/1960	908

Let me know the best way to coordinate this. If you want us to send someone over to copy/scan things at your office or if there is a better way.

Have a great weekend.

Best,
Ann

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